

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANGELICA JUNIOUS,)	
)	
Plaintiff,)	
)	Case No. 1:22-CV-3681
v.)	
)	Honorable Judge Edmond E. Chang
SGT. W. BAKER #3159,)	
R/O C. CHENGARY #16269,)	
R/LT PURCELL #758,)	Magistrate Judge Maria Valdez
OFFICER NEALON # 18420,)	
OFFICER WALZ #18563,)	
OFFICER RAHN #17086,)	
OFFICER GLAZIERS,)	
COOK COUNTY SHERIFF TOM DART,)	
and COOK COUNTY, ILLINOIS,)	JURY DEMAND
)	
Defendants.)	

DEFENDANTS' JOINT MOTION TO EXTEND FACT DISCOVERY

NOW COMES the Defendants by and through their respective attorneys, and in support of Defendants' joint motion to extend fact discovery, the Defendants state as follows:

1. On January 11, 2023, Plaintiff filed a five-count complaint alleging a violation of her constitutional rights pursuant to 42 U.S.C. §1983 and §1988, alleging that the Defendants failed to protect her while she was detained at the Cook County Jail on or about December 30, 2021. (Dkt. 42).
2. The fact discovery cut off in this case is set for June 30, 2023. (Dkt. 24).
3. The parties have tendered Rule 26(a) disclosures, propounded and answered interrogatories and requests to produce except for Defendant Nealon.
4. Depositions of the parties have not been scheduled due to ongoing written discovery and document production.

5. On June 30, 2023, counsel for Defendants conferred with Plaintiff's counsel, and Plaintiff's counsel agreed to waive taking the Defendants' depositions.

6. Defendants intend to take the Plaintiff's deposition, and complete fact discovery by September 1, 2023.

7. On June 30, 2023, counsel for Defendants conferred with Plaintiff's counsel regarding this motion, and Plaintiff's counsel indicated that they take no position.

8. The Defendants request that this Honorable Court extend the close of discovery through September 1, 2023.

9. This request is not made to delay the proceedings, rather it is made in the interest of justice and to afford the parties effective representation.

WHEREFORE, for the reasons stated above, the Defendants respectfully request this Honorable Court for entry of an order extending the discovery to and including September 1, 2023.

Respectfully Submitted,

/s/ Antonio C. Lee
Antonio C. Lee
Cook County State's Attorney's Office
50 W. Washington St.
Chicago, IL 60602
(312) 603-5439
Email: antonio.lee@cookcountylil.gov
Attorney for Defendants, W. Baker Sgt;
#3159, C. Chengary R/O; #16269, Purcell
R/LT; #758, Thomas Dart, Sheriff, Cook
County, Illinois, Officer Walz & Officer
Rahn

/s/ Lisa M. McElroy
KIMBERLY M. FOXX
State's Attorney of Cook County
Monica Burkoth (burkothm@jbltd.com)
Lisa M. McElroy (mcelroyl@jbltd.com)
Johnson & Bell, Ltd.

33 W. Monroe, Ste. 2700
Chicago, Illinois 60603
(312) 372-0770
Attorney for Defendant Nealon